UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 02 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 5899
RETURN RECEIPT REQUESTED

Mr. Mark Schembri
Process and Fabrication Manager
Precise Finishing Systems
1650 North Burkhart Road
Howell, Michigan 48855

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
EPA I.D. No.: MID985612597

Dear Mr. Schembri:

On February 27, 2014, representatives of the U.S. Environmental Protection Agency and the Michigan Department of Environmental Quality (MDEQ) inspected Precise Finishing Systems ("PFS") and Trace-Zero, Inc. located in Howell, Michigan. The purpose of the inspection was to evaluate PFS's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq*., and its implementing regulations; specifically, the regulations governing the generation, treatment, and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on the observations of the inspector, information provided by PFS personnel, and a review of records, EPA finds that PFS is engaged in the management of hazardous waste without a hazardous waste license, and is in violation of certain requirements of the Michigan Administrative Code (MAC) and the United States Code of Federal Regulations (C.F.R.). To be eligible for the exemption from the requirement to obtain a hazardous waste storage license, the conditions of MAC R. 299.9306(1) and (2) [40 C.F.R. § 262.34(a)-(c)] must be met. Specifically, EPA finds that PFS failed to comply with the following conditions for a storage license exemption, and is in violation of the following requirements:

1. To avoid the need for a hazardous waste storage license, a large quantity generator of hazardous waste that accumulates hazardous waste in containers must mark each container with an accumulation start date. *See* MAC R. 299.9306(1)(b) [40 C.F.R. § 262.34(a)(2)]. A large quantity generator of hazardous waste that accumulates waste in containers must also label or mark clearly each container with the words, "Hazardous Waste." *See* MAC R. 299.9306(1)(c) [40 C.F.R. § 262.34(a)(3)]. In the State of Michigan, it is further required that containers used to store hazardous waste must also be

labeled or marked with the hazardous waste number (code) of the waste. *See* MAC R. 299.9306(1)(b).

At the time of inspection, PFS was storing hazardous waste in 55-gallon drums in its painting area and near the electropolishing area. The drum near the electropolishing area was accumulating spent electropolishing solution filters and was dated and labeled as "Hazardous Waste." However the drum was not marked with a hazardous waste number (code). In the painting area, there were four drums storing waste purge solvent and spent paint filters. One of the drums was currently accumulating waste purge solvent. The four drums were labeled as "Hazardous Waste" and were dated as required. However, none of the drums were marked with their hazardous waste number (code).

2. To avoid the need for a hazardous waste storage license, a large quantity generator of hazardous waste must have a contingency plan which lists the emergency equipment on site, such as fire extinguishing systems, spill control equipment, internal and external communications and alarm systems, and decontamination equipment. The plan must include the location of each item on the list, as well as a physical description of the equipment and a brief outline of its capabilities. The contingency plan must also contain an evacuation plan for facility personnel that describes signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes. *See* MAC R. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4); 265.52(e) and (f)].

   At the time of inspection, PFS's hazardous waste contingency plan had a list of emergency equipment available on site, but the list did not specify the location of the emergency equipment or provide a brief description of its capabilities or uses. The contingency plan also did not contain an evacuation plan that outlined specific evacuation routes and signals. PFS personnel said the facility did have an evacuation plan and presented a separate copy during the inspection. However, it is still required that the contingency plan include a copy of the evacuation plan. PFS, therefore, failed to comply with the above conditions for a hazardous waste storage license exemption.

3. To avoid the need for a hazardous waste storage license, a large quantity generator of hazardous waste must maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. *See* MAC R. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4); 265.31].

   At the time of inspection, a solid green chemical build-up was observed on PFS's electropolishing tanks and the catwalk that surrounded the electropolishing tanks. The green residue may contain hazardous waste constituents, such as chromium, which could threaten the health of employees in the area. Furthermore, at the time of inspection, a noticeable volume of green liquid was accumulating in the secondary containment around the electropolishing tanks. The west side of the secondary containment area had a prominent hole in which the green liquid was accumulating. This green liquid may also contain hazardous waste constituents, such as chromium, which could threaten the health of employees in the area or potentially impact the soil beneath the containment area. PFS,

therefore, failed to comply with the above condition for a hazardous waste storage license exemption.

4. A generator of hazardous waste who accumulates hazardous waste on site and who does not meet the other conditions for the hazardous waste license exemption of MAC R. 299.9306(1)-(2) [40 C.F.R. § 262.34(a)-(c)], is an operator of a hazardous waste storage facility and is required to obtain a hazardous waste license. *See* MAC R. 299.9502(1), 299.9508, and 299.9510 [40 C.F.R. §§ 270.10(a) and (d)].

   On failing to comply with the conditions for a license exemption referenced in items 1 through 3 above, PFS became an operator of a hazardous waste storage facility, and was required to apply for and obtain a hazardous waste license. PFS's failure to apply for and obtain a hazardous waste license violated the licensing requirements of MAC R. 299.9502(1), 299.9508, and 299.9510 [40 C.F.R. §§ 270.1(c); 270.10(a) and (d)].

At this time, EPA is not requiring PFS to apply for a hazardous waste license, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Brian Kennedy, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, feel free to contact Mr. Kennedy, of my staff, at (312) 353-4383.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: William Yocum, MDEQ – (yocumw@michigan.gov)
John Craig, MDEQ – (craigj@michigan.gov)
Lonnie Lee, MDEQ – (leel@michigan.gov)

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:	February 27, 2014
SITE NAME:	Precise Finishing Systems
ADDRESS:	1650 North Burkhart Road Howell, Michigan 48855
EPA ID NUMBER:	MID985612597
GENERATOR STATUS:	Large Quantity Generator
NAICS CODE:	335999 All Other Miscellaneous Electrical Equipment and Component Manufacturing
FACILITY CONTACT:	Mark Schembri Process and Fabrication Manager
EPA INSPECTOR:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: Brian Kennedy — **Brian Kennedy** — 3/26/2014 — **Date**

ACCEPTED BY: — **Julie Morris**
Chief, Compliance Section 2 — 4/18/14 — **Date**

Purpose of Inspection

An unannounced Compliance Evaluation Inspection (CEI) of Precise Finishing Systems (hereinafter "PFS" or "facility") located at 1650 North Burkhart Road, Howell, Michigan took place on February 27, 2014. The CEI was conducted by U.S. Environmental Protection Agency and Michigan Department of Environmental Quality (MDEQ) personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Michigan Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of PFS's compliance with those regulations governing large quantity generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

Mark Schembri – Process and Fabrication Manager	PFS
Michael McLean – President	PFS
William Yocum – Environmental Quality Analyst	MDEQ
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site with William Yocum of MDEQ at 9:15 AM EST. We entered the main office and asked an employee to see the facility environmental coordinator or safety manager. Soon afterward, we were introduced to Mr. Mark Schembri, PFS's Process and Fabrication Manager. We proceeded to a nearby conference room where I presented my enforcement officer credentials and business card. Mr. Michael McLean, PFS's President also joined us in the conference room. I described the purpose of the U.S. EPA lead RCRA inspection and the process by which I would conduct the inspection, including a facility walk-through which would include photographs of hazardous waste storage areas, as well as a review of PFS records pertaining to hazardous waste.

I informed Mr. McLean and Mr. Schembri of the right to make a confidential business information claim over any information collected during the inspection.

Site Description

The following information about PFS is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

Originally opened in 1998, PFS specializes in the manufacture of fluid delivery systems for industrial and automotive applications. More specifically, PFS assembles a variety of turnkey paint systems and customized paint mix sets, paint and sealer temperature control systems, paint and water filtration systems, and paint waste handling systems. PFS also conducts electropolishing of stainless steel, specialty stainless steel and tank fabrication, and a small

painting operation. PFS has approximately 30 to 35 employees at its 23,000 ft^2 facility, working one shift from 6:30 AM to 3:00 PM. Employees typically work five days per week.

PFS notified in 2012 as a Large Quantity Generator of hazardous waste. The largest hazardous waste stream produced on site is generated by its electropolishing operation. Electropolishing ("EP"), which provides PFS's stainless steel components with a smooth, reflective finish, is conducted in a series of acid and rinse baths. Parts are submerged in a polishing tank that contains a mixture of sulfuric and phosphoric acid. A current is applied to several copper cathodes, and the submerged part acts as the anode. By completing the circuit this way, the surface layer of the part dissolves into the electrolytic solution to leave a uniform surface. The part is then removed from the polishing tank and rinsed with water over two rinsate collection tanks. PFS periodically drains its rinsate tanks into totes, and ships the material off-site as D002 and D007 hazardous waste. Less frequently, PFS also drains its polishing tank and ships the solution and any bottom material off-site as D002 and D007 hazardous waste.

PFS also generates hazardous waste through its painting operations. Purge solvents containing lacquer thinner (acetone) and toluene are accumulated in drums and shipped off-site as D001, F003 and F005 hazardous waste. PFS also accumulates and sends its paint filters off-site with the same waste codes. EQ Detroit is PFS's waste contractor and removes the EP and paint wastes.

PFS has a facility-wide intercom system, as well as a sprinkler system and several fire extinguishers. Associated Fire Protection, Inc. services the facility's fire extinguishers. PFS also contracts with Certified Electric to remove its universal waste bulbs. Used oil is not generated by any process on site.

In addition to PFS, the Howell facility also houses a second company, Trace-Zero, Inc., which specializes in producing high purity malonic and citric acids for use in the microelectronics industry. Trace-Zero originally moved into the facility in 2009 and shares part of the production floor with PFS. Trace-Zero generates D002 hazardous waste acids and other smaller chemical waste streams. The company ships its hazardous waste off-site using PFS's EPA generator identification number, but it is indicated on the manifest that the generator of the waste is Trace-Zero. Mr. Kyle White, Trace-Zero's Production Manager, joined the opening conference and provided more detail about the company and its relationship with PFS. Trace-Zero's President, Mr. Frank Taube, was not on site during the inspection.

Facility Walk-Through

Mr. Yocum and I were led through the facility by Mr. Schembri and Mr. McLean. We first walked through PFS's main fabrication area along the north edge of the facility. There were PFS employee assembling and welding a large stainless steel tank, and several smaller workstations where other employees were conducting spot welding. There was large box of scrap metal in the area. Mr. McLean said scrap metal is sent for recycling at H&H Metals. There was no hazardous waste observed in the fabrication area.

The walk-through proceeded to the east side of the facility, where PFS houses its EP operation. There were four, 1,700-gallon open top tanks in a large bermed containment area. Three tanks along the back wall were surrounded by a raised catwalk. Mr. Schembri described the EP process

and pointed out the prep tank on the left side of the catwalk, which was covered and not in use at the time of inspection, the polishing tank in the center, and the rinsate tanks on the right. There was a fourth tank in the containment but outside of the catwalk. Mr. Schembri called it the "deox" cleaning tank and said it contained phosphoric acid. He stated that tank hadn't been used in years, but that the acid inside is still usable.

Mr. Yocum and I proceeded up the catwalk and observed the prep tank. There was significant green metallic build-up on the back of the tank (See Photo 1 in Attachment A: Inspection Photographs). Mr. Yocum expressed concern that vapors were condensing in a fume hood above the tank and dripping down the side of the tank. We observed the polishing tank and its copper cathodes. The acidic solution inside the tank was dark green. To the right of the polishing tank was the first rinsate tank (See Photo 2). This tank was about a quarter full of rinsate (See Photo 3). To the right of this tank was the second rinsate tank, which appeared to be half full (See Photos 4 and 5). The material in both the rinsate tanks was dark green. The catwalk and its railings surrounding the polishing and rinsate tanks were corroded. Parts transferred from the polishing tank to the rinsate tanks appear to have dripped acidic EP solution onto the catwalk and collected in the containment area below. The front of the containment area appeared to have an inch of standing liquid (See Photo 6). The liquid was light green and was likely a mixture of rinse water and EP solution. There was also a deep hole in the front of the containment area in which the green solution was accumulating (See Photo 7). There was a 55-gallon drum labeled hazardous waste and dated 1/22/2014 adjacent to the EP containment area (See Photo 8). Mr. Schembri said the drum contained spent filters that are used to clean the EP solution. This waste stream is shipped off-site as D002 and D007 hazardous waste.

Along the back wall behind the EP tanks and catwalk were several empty totes (See Photo 9). When the rinsate tanks are full, they are drained into these totes and shipped off-site as the D002 and D007 hazardous waste. The EP containment area is constructed to drain into its southeast corner. This corner of the containment area has a sump attached to a manually operated pump that can transfer the accumulated liquid back into the rinsate tanks or totes. At the time of inspection there were several inches of green solution collecting around the sump (See Photo 10).

The walk-through proceeded west to the Trace-Zero production area, a smaller space that was cordoned off by plastic curtains. Across the aisle was a large hazardous waste storage area. Mr. White, who joined the walk-through at this point, stated this area was strictly for Trace-Zero's hazardous waste streams. There were approximately eight totes and nineteen 55-gallon drums of hazardous waste in the area. Many of the drums were labeled as "Resin/Acid" and several totes were labeled as "Rinse Acid" (See Photos 11 through 16). It was difficult to inspect the containers as they were closely packed. Many of the containers appeared to be dated before 90 days prior to the inspection, including a tote dated 10/4/2013 and a drum dated 11/12/2013. Mr. White clarified that this entire hazardous waste storage had been cleared the month prior, and that the hazardous waste labels and dates were not accurate.

Mr. Schembri led us to PFS's painting area, a separate room on the southern portion of the facility. Inside there was a PFS employee using a paint spray gun to coat a new set of railings. Near the paint booth were two 55-gallon hazardous waste drums in a containment cabinet used to

collect purge solvent. One drum was full and was dated 1/15/2014. The other drum was equipped with a closed bung funnel and was still collecting waste (See Photo 17). There were no waste codes on the drums. To the right of those drums were two other stacked 55-gallon drums (See Photo 18). The drums were marked as hazardous waste and contained spent paint filters. The drums were dated 2/2/2014 and 2/21/2014.

Mr. Schembri led the walk-through back through the Trace-Zero production area to the conference room.

Record Review

I asked Mr. Schembri and Mr. McLean for the following documents to review:

- Hazardous waste manifests for the previous three years
- Waste characterization and determination records for PFS's waste streams
- A copy of PFS's hazardous waste contingency plan
- Hazardous waste training records for applicable PFS employees
- Hazardous waste storage area inspection logs

A facility diagram of PFS is in Attachment B.

Mr. Schembri presented several folders containing PFS's hazardous waste manifests. I viewed the most recent manifest, dated 1/24/2014. It displayed the shipment of 4,700 gallons of D002 malonic acid. The generator on the manifest was marked as Trace-Zero, albeit with PFS's generator identification number. The manifest prior to this shipment, dated 1/17/2014, also was for Trace-Zero hazardous waste. There was a separate 1/24/2014 manifest for PFS material. This manifest displayed the shipment of 4,700 gallons of D002, D006, and D007 sulfuric and phosphoric acid from the EP rinsate tanks. Mr. Schembri clarified that the D006 waste code was an oversight on the pre-printed manifest, and that the EP rinsate tanks were emptied every few months. I viewed another manifest from 11/5/2013. It displayed the shipment of two drums of D001, D005, F003, and F005 hazardous waste paint filters and one drum of D001 hazardous waste paint solvent waste. Another manifest on the same date showed the previous EP rinsate tank shipments of D002 and D007 hazardous waste. The PFS and Trace-Zero manifests appeared complete and land disposal restriction notification forms were available for the waste streams.

Mr. Schembri also presented several records that PFS employees had received in-classroom hazardous waste management training in 2011, 2012 and 2013.

I viewed PFS's weekly hazardous waste area inspection logs. Several years' worth of inspection logs were available, and many recent logs recorded that PFS's drums were labeled properly, including the most recent inspection. During the walk-through, however, most of the hazardous waste drums were not labeled properly and did not have the hazardous waste code as required in the State of Michigan.

I reviewed PFS's hazardous waste contingency plan. The plan listed a rally point for employees in case of an emergency, but there was no specific evacuation plan or evacuation routes provided in the plan. However, Mr. Schembri said a more detailed evacuation plan is posted around the

facility and produced a copy. The contingency plan provided a list of emergency equipment available on-site, but that list did not specify the location of the equipment or describe its use or capabilities. The plan did have current emergency coordinators and their contact information.

Mr. Schembri presented some EQ waste profiles for PFS's paint wastes, EP waste and Trace-Zero's hazardous waste streams. These profiles matched the hazardous waste codes viewed on the hazardous waste manifests. The waste profile for PFS's EP waste confirmed the material had been characterized as D002 and D007 hazardous waste. An EQ profile for PFS's EP waste is in Attachment C.

Closing Conference

I summarized my review of the site to Mr. Schembri, Mr. McLean and Mr. White. Mr. Yocum and I discussed the green metallic residues present on the outside of EP tanks, and that the material may be a hazardous waste when the tanks are cleaned. We also stated our concern with the potential status of the EP rinsate tanks, and whether they act as hazardous waste accumulation tanks that would be subject to more stringent requirements or as unregulated process tanks. This was also a concern because the free liquid present in the secondary containment system, which appeared to be EP solution, may be pumped back into the rinsate tanks via sump and then shipped off-site as hazardous waste. I stated that PFS cannot store, even temporarily, any solutions that may be hazardous waste in the secondary containment area. Mr. Yocum and I also discussed the apparent hole in the secondary containment floor that was collecting green solution.

I stated that PFS should complete its hazardous waste storage area inspection logs accurately and indicate on its hazardous waste containers the waste codes for the material they store.

I told Mr. White that the Trace-Zero hazardous waste storage area needed to have adequate space between containers such that the containers could be easily inspected. I also stated that Trace-Zero needed to properly label and date its hazardous waste containers.

I stated I might have some follow-up questions in the weeks following the inspection.

PFS declined to make confidential business information claim during the inspection.

The inspection ended around 12:30 PM.

Inspection Follow-Up

On February 28, 2014, I provided Mr. Schembri electronic copies of EPA's Small Business Resources and Pollution Prevention information sheets.

Attachments

A. Inspection Photographs
B. Facility Diagram
C. Hazardous Waste Manifests
D. Inspection Checklist

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

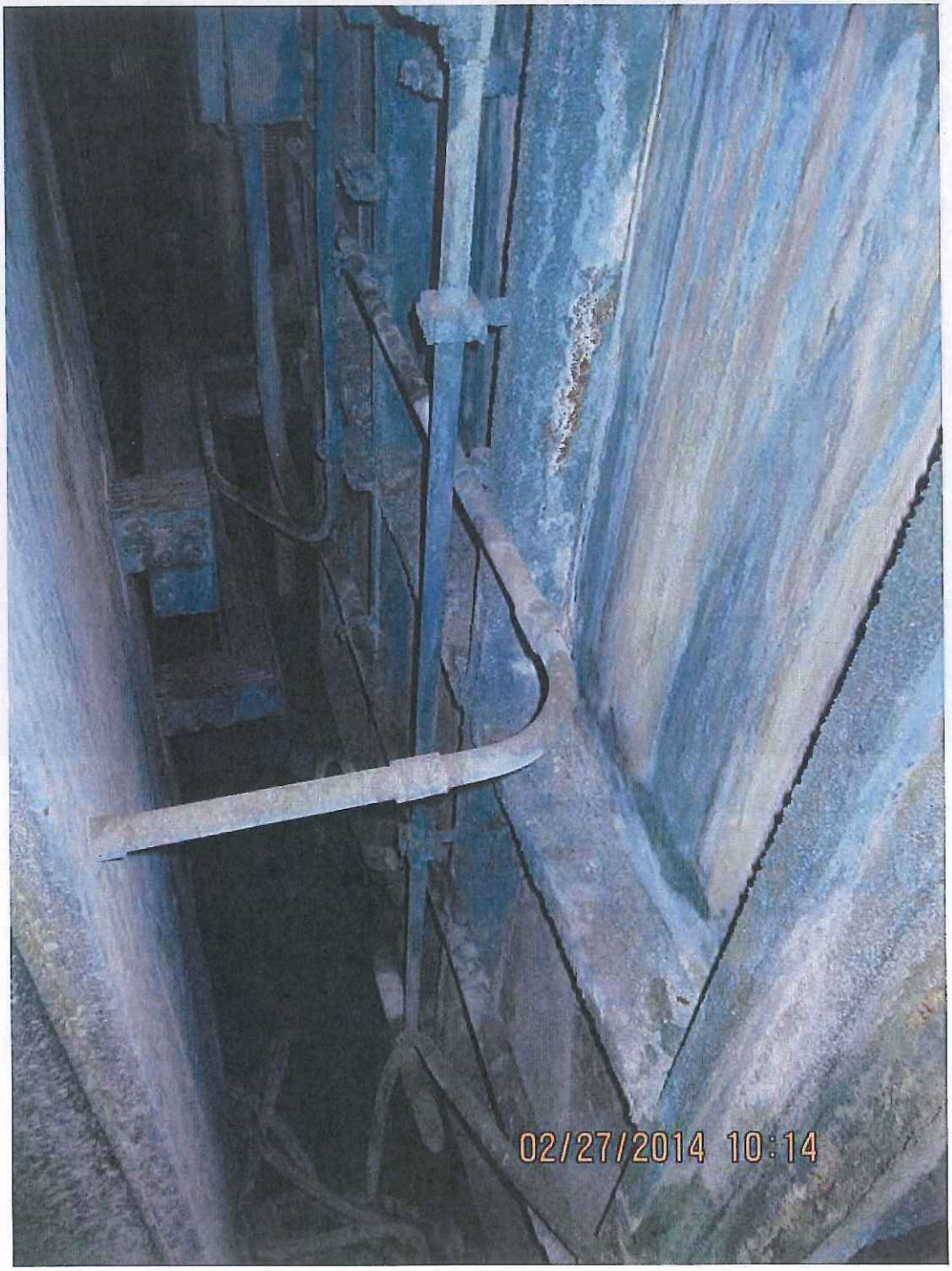


Photo 1: Green staining and metallic buildup on the back of the EP prep tank. The staining may be from occasional spills or condensed vapors in a fume hood above the tank (not pictured).

Photo 2: The first 1,700-gallon rinsate collection tank in the EP area.

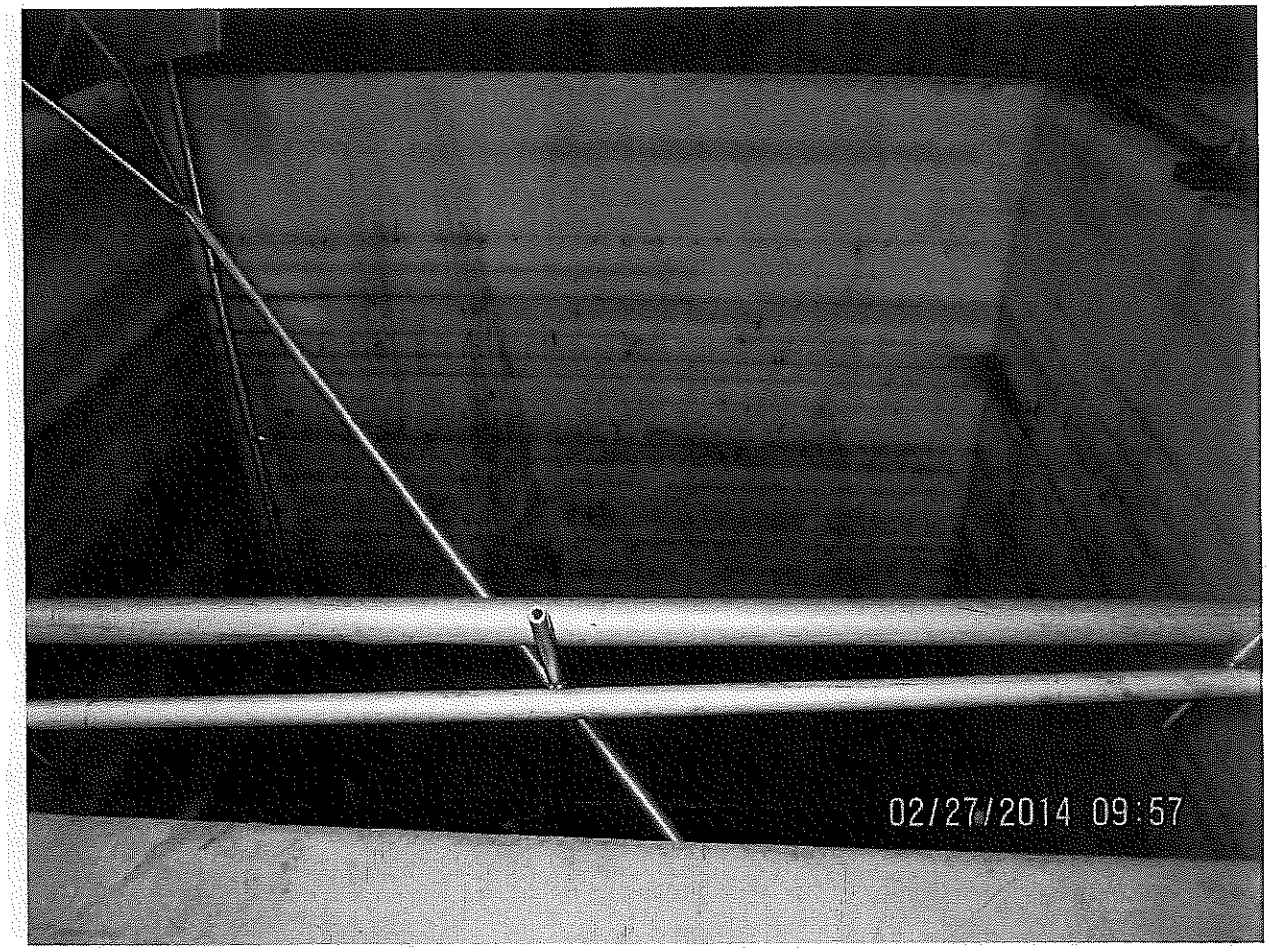


Photo 3: The inside of the first EP rinsate collection tank.

Photo 4: The second 1,700-gallon EP rinsate collection tank.

Photo 5: Inside the second EP rinsate collection tank.

Photo 6: Inside the containment area that surrounds the EP tanks (berm not pictured). The bottoms of the EP tanks and the yellow catwalk legs are visible in the background. There was approximately one inch of green solution, possibly EP solution, inside the containment area. Note the hole in the containment floor to the right which was accumulating the green solution.

Photo 7: A hole in the floor of the EP secondary containment area that was accumulating green solution.

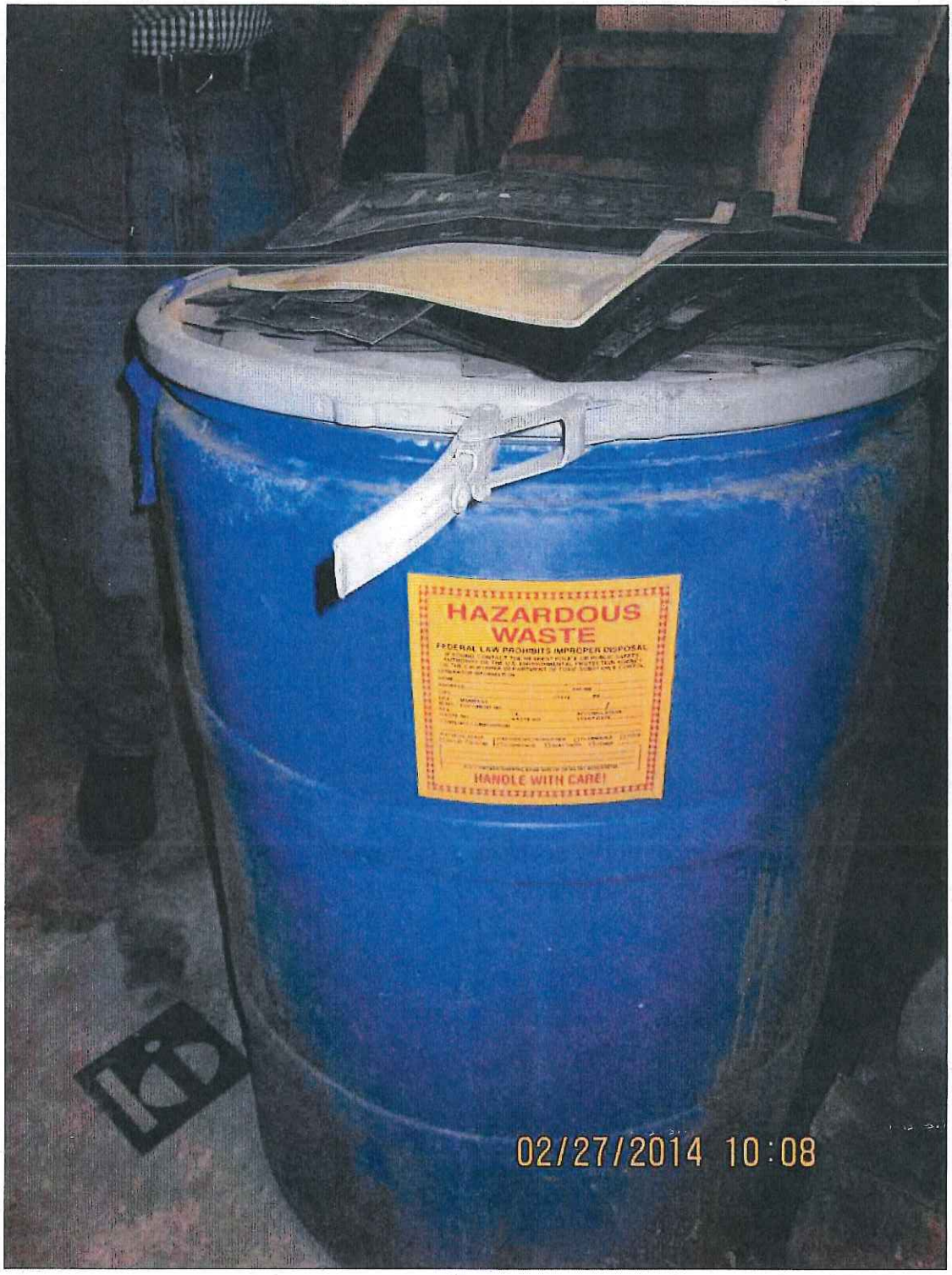


Photo 8: A 55-gallon drum near the EP secondary containment that was accumulating EP solution filters. The drum was dated 1/22/14 but was not marked with hazardous waste codes.

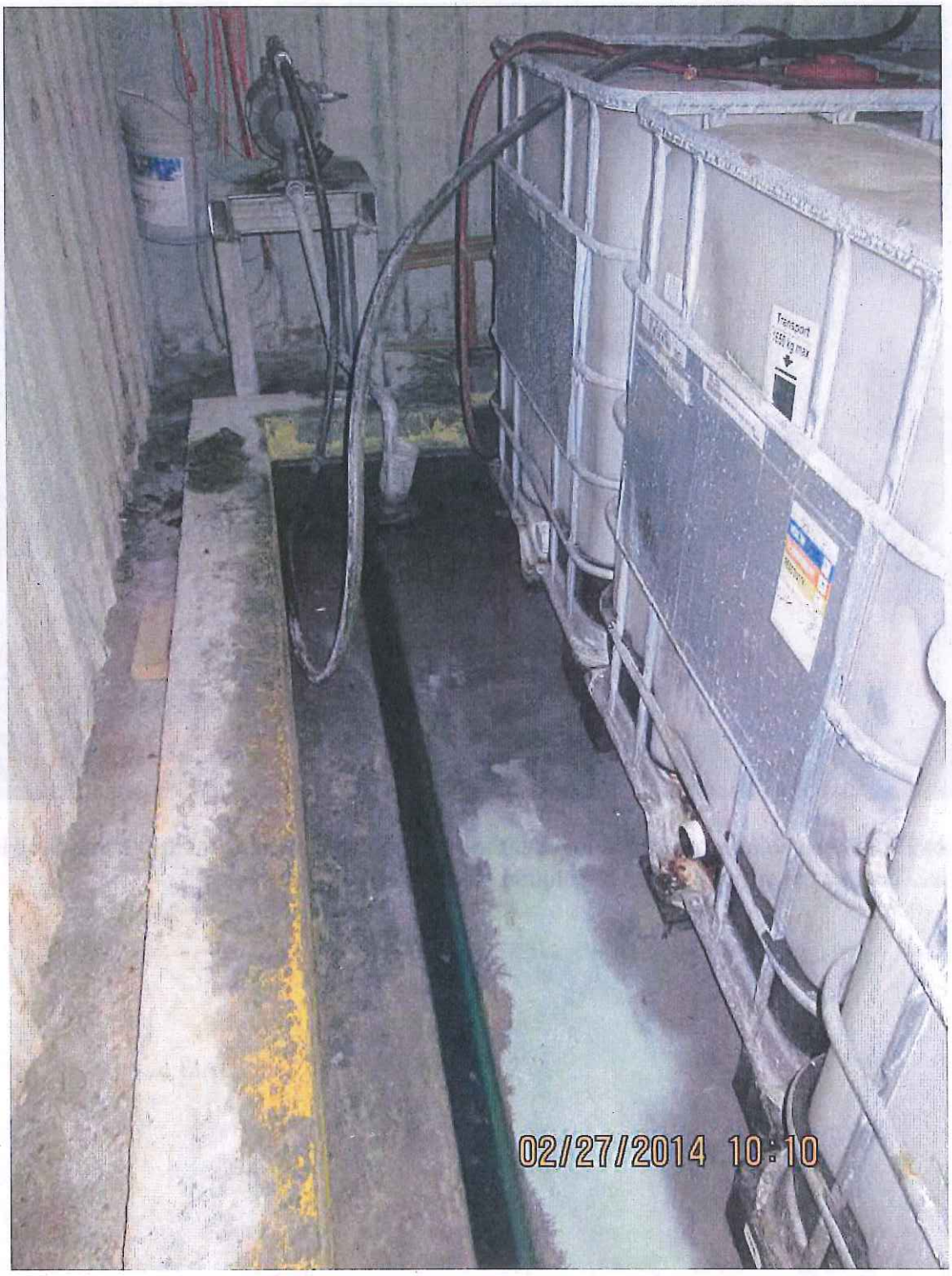


Photo 9: The secondary containment area behind the EP tanks. When the EP rinsate tanks are filled, they are drained into the pictured totes. The totes were empty during the inspection. Note the green solution accumulating near the sump in the corner of the containment area, and the pump in the background which can transfer the solution into totes or rinsate tanks.

Photo 10: Green solution accumulating near the sump in the containment area behind the EP tanks. There were several inches of solution present near the intake.

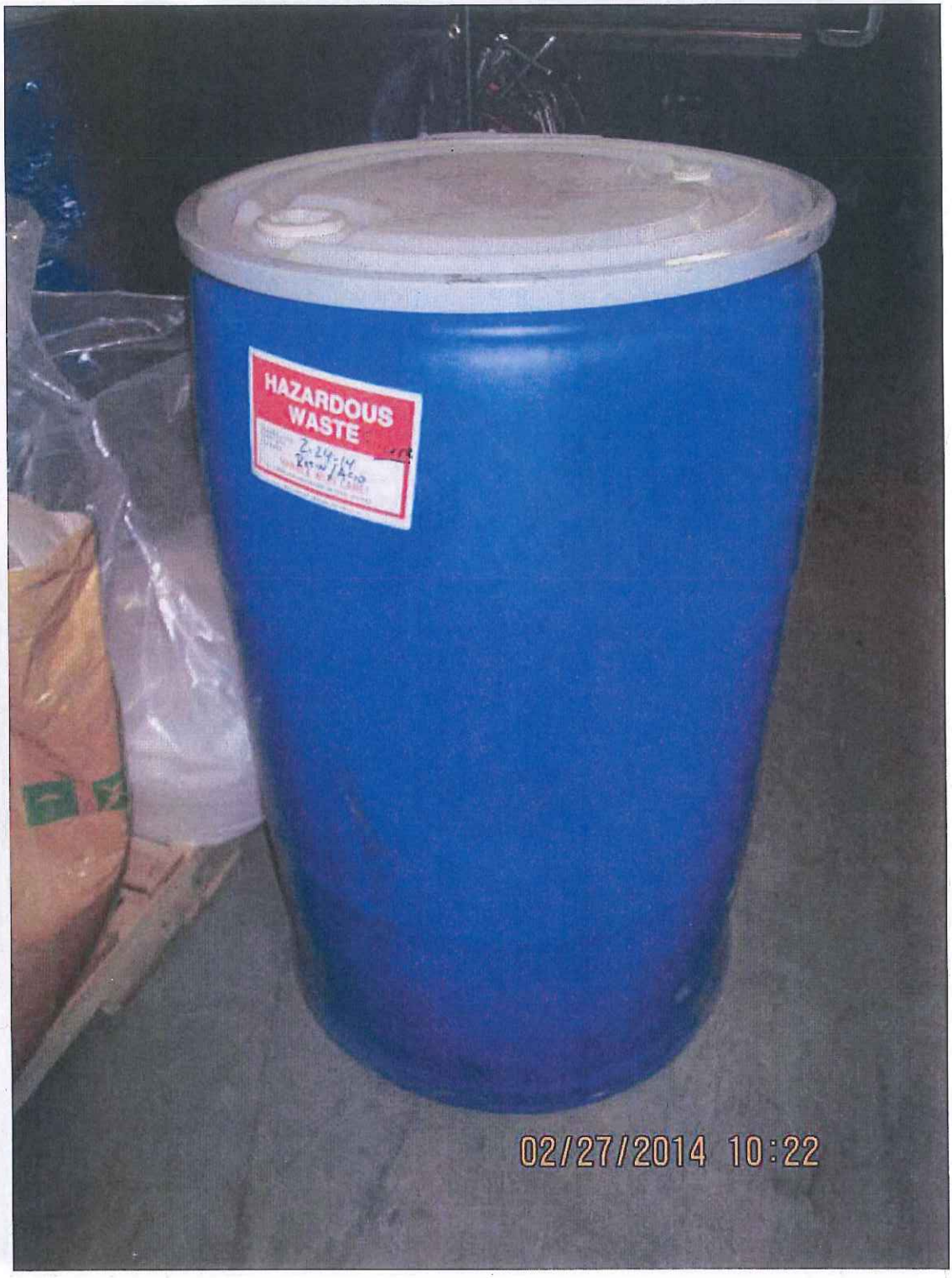


Photo 11: A 55-gallon drum in the Trace-Zero hazardous waste storage area marked as waste resin/acid filters. The drum was dated three days prior to the inspection and did not have a hazardous waste code.

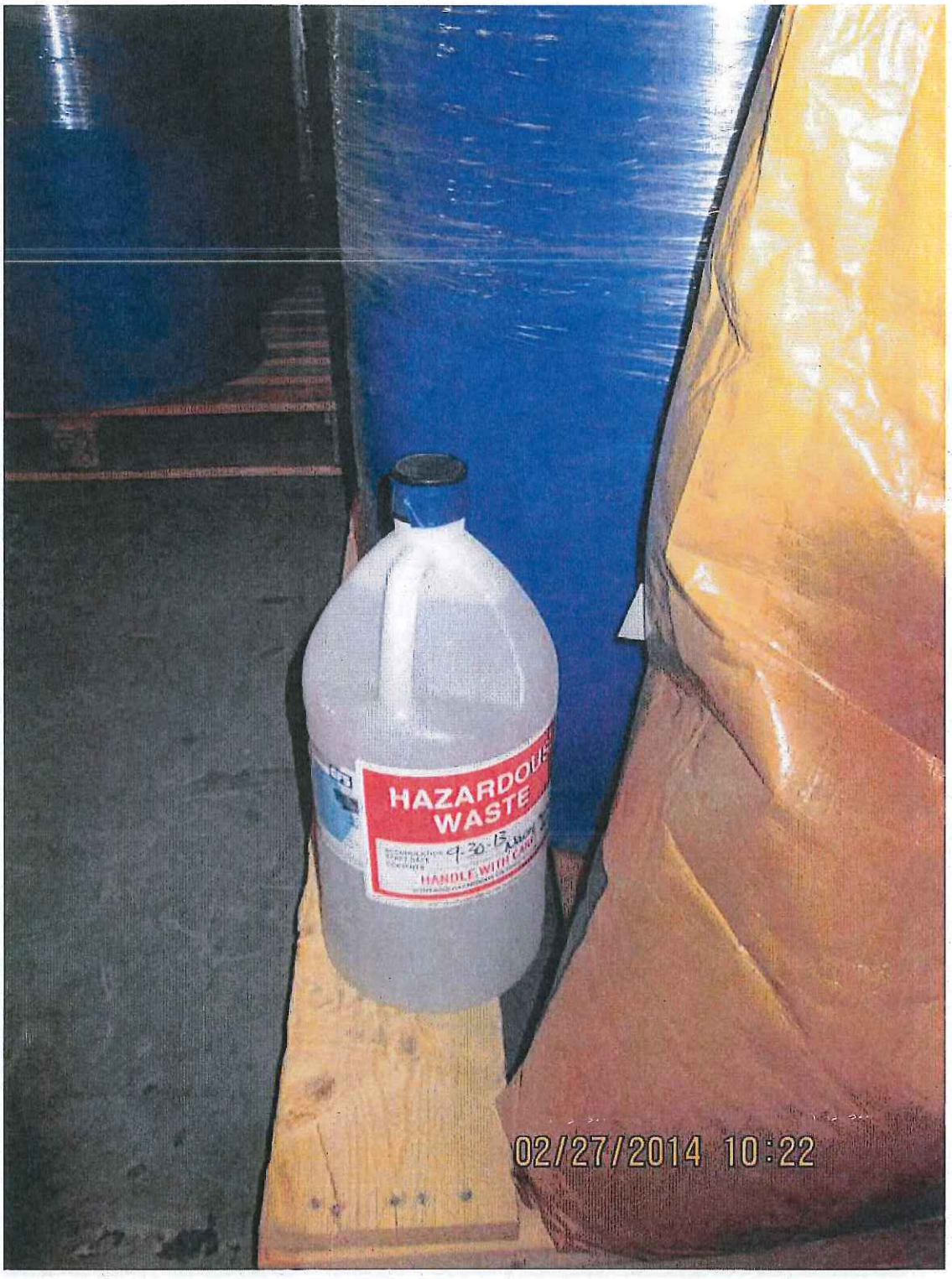


Photo 12: A small container of hazardous waste sodium hydroxide in the Trace-Zero hazardous waste storage area. The container was dated 9/30/13, but Mr. White indicated that the labels on the containers in the area were inaccurate and that the area had been cleared of hazardous waste the month prior.

Photo 13: Two 55-gallon drums in the Trace-Zero hazardous waste storage area. They were dated 2/21/14 and labeled as "Used Acid/Resin," but without hazardous waste codes.

Photo 14: Several hazardous waste containers in Trace-Zero's storage area. The tote in the center was dated 2/26/14 and labeled as "Rinse Acid," but without a hazardous waste code.

Photo 15: Two totes in Trace-Zero's hazardous waste storage area. The dates on these totes are unclear, but they contained "Malonic Acid" and "Used Acid."

Photo 16: Additional drums in Trace-Zero's hazardous waste storage area. The drums pictured were dated as January 2014 and labeled as "Resin/Acid."

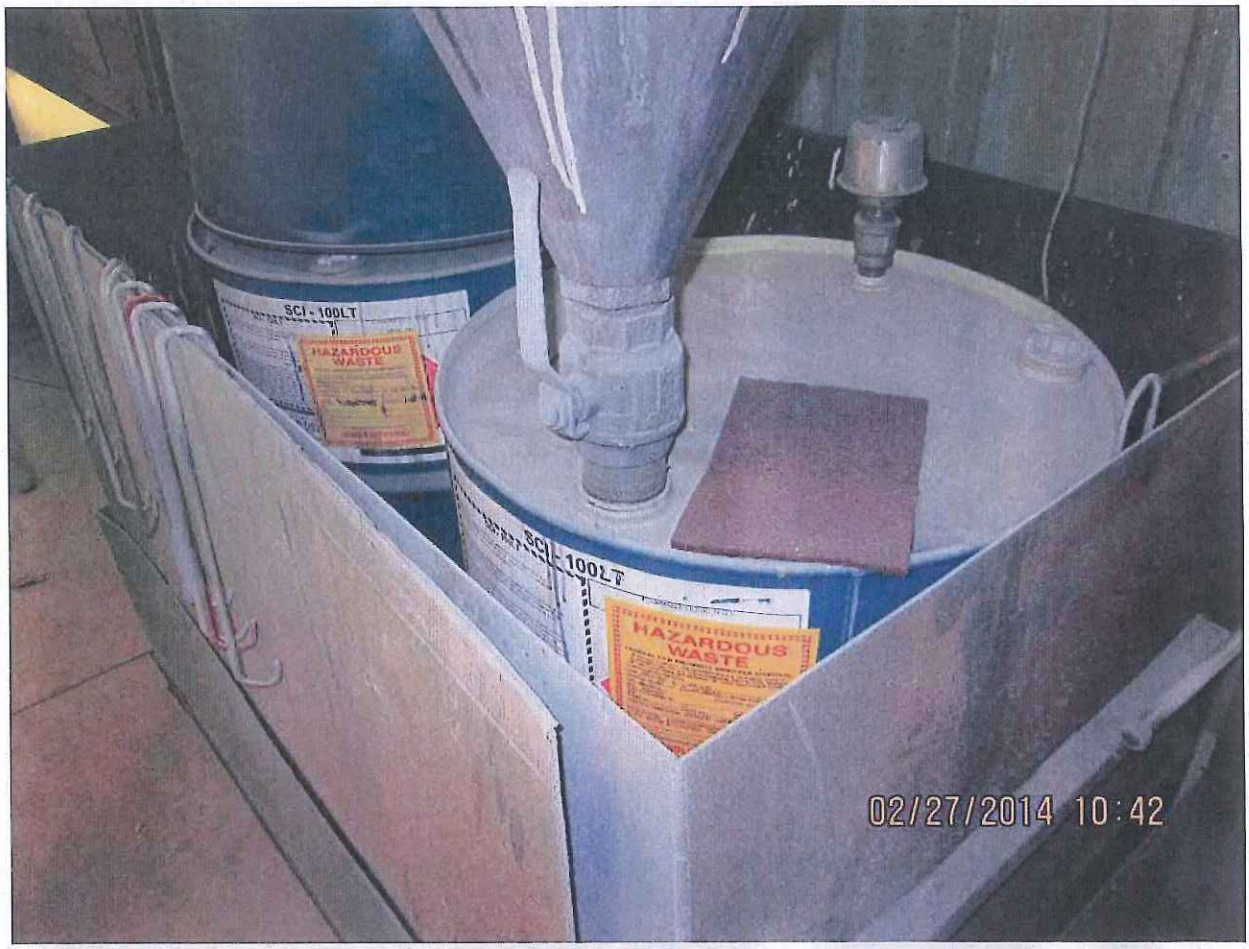


Photo 17: Two 55-gallon drums containing purge solvent paint waste in PFS's painting area. The drum on the right was currently accumulating waste and was not dated. The drum on the left was full and dated 1/15/14. Neither drum had waste codes.

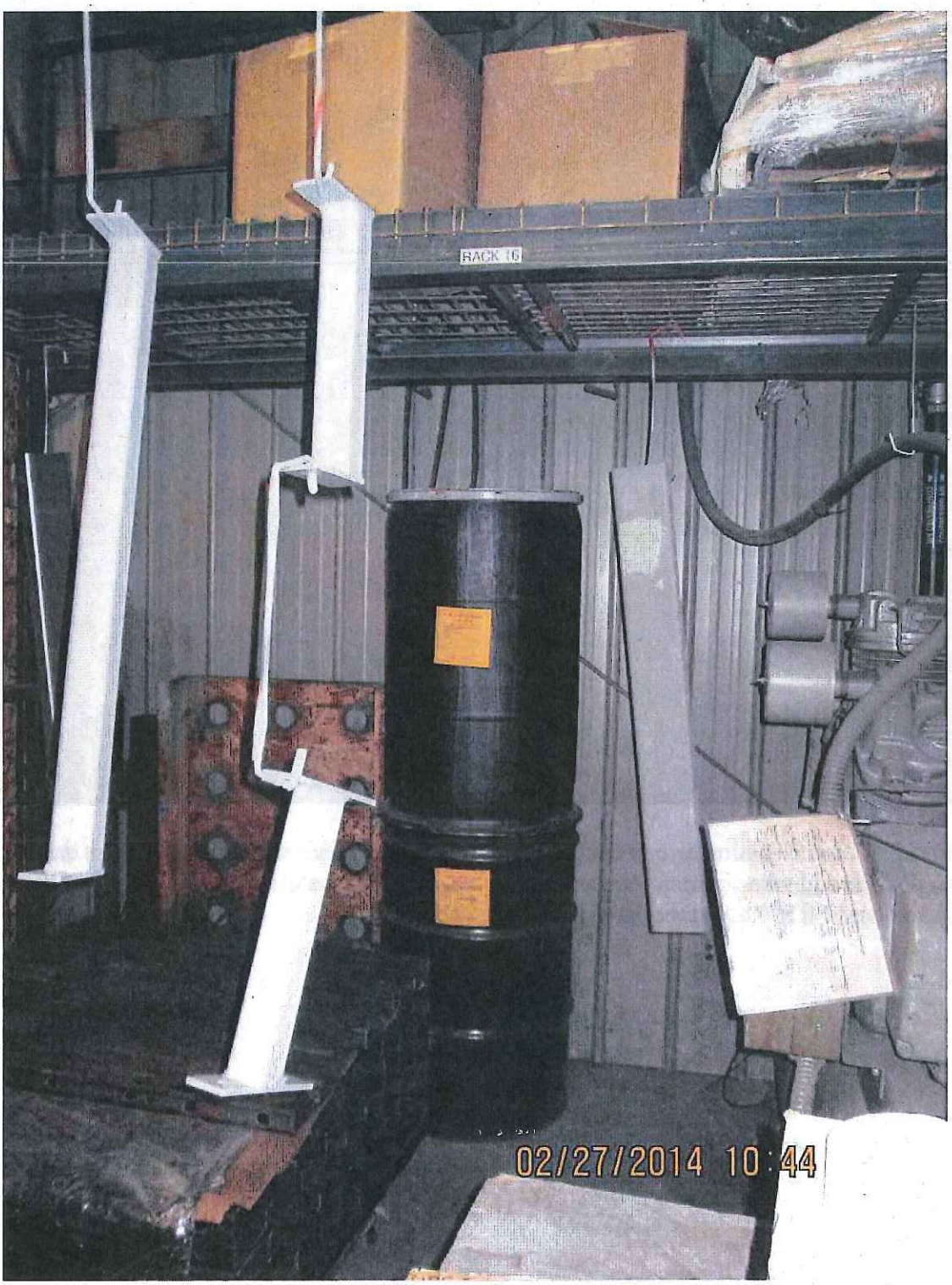
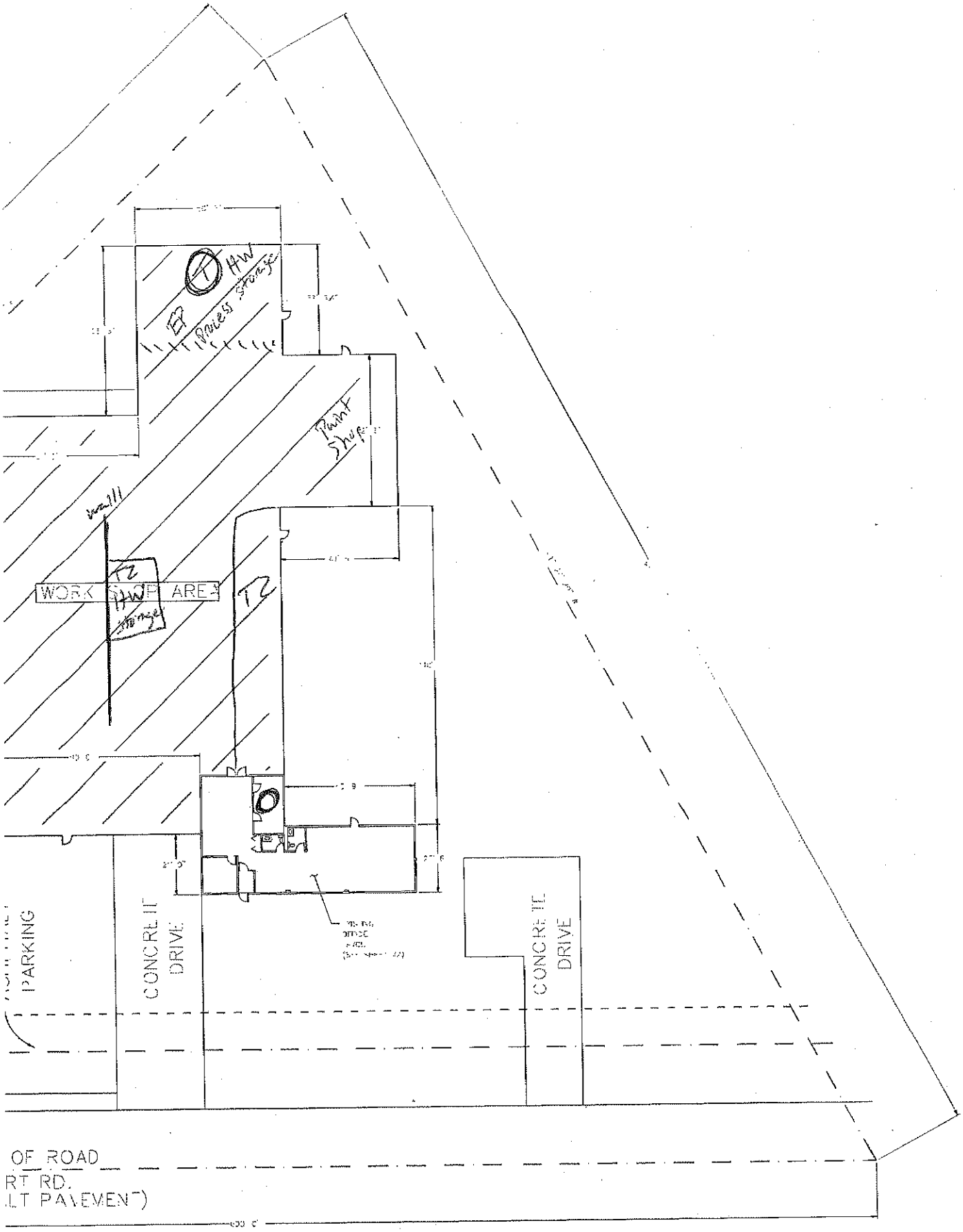


Photo 18: Two drums of waste paint filters in PFS's painting area that were inaccessible at the time of the photo. The drums were accessible shortly after. The drums were dated 2/2/2014 and 2/21/2014.

ATTACHMENT B: Facility Diagram

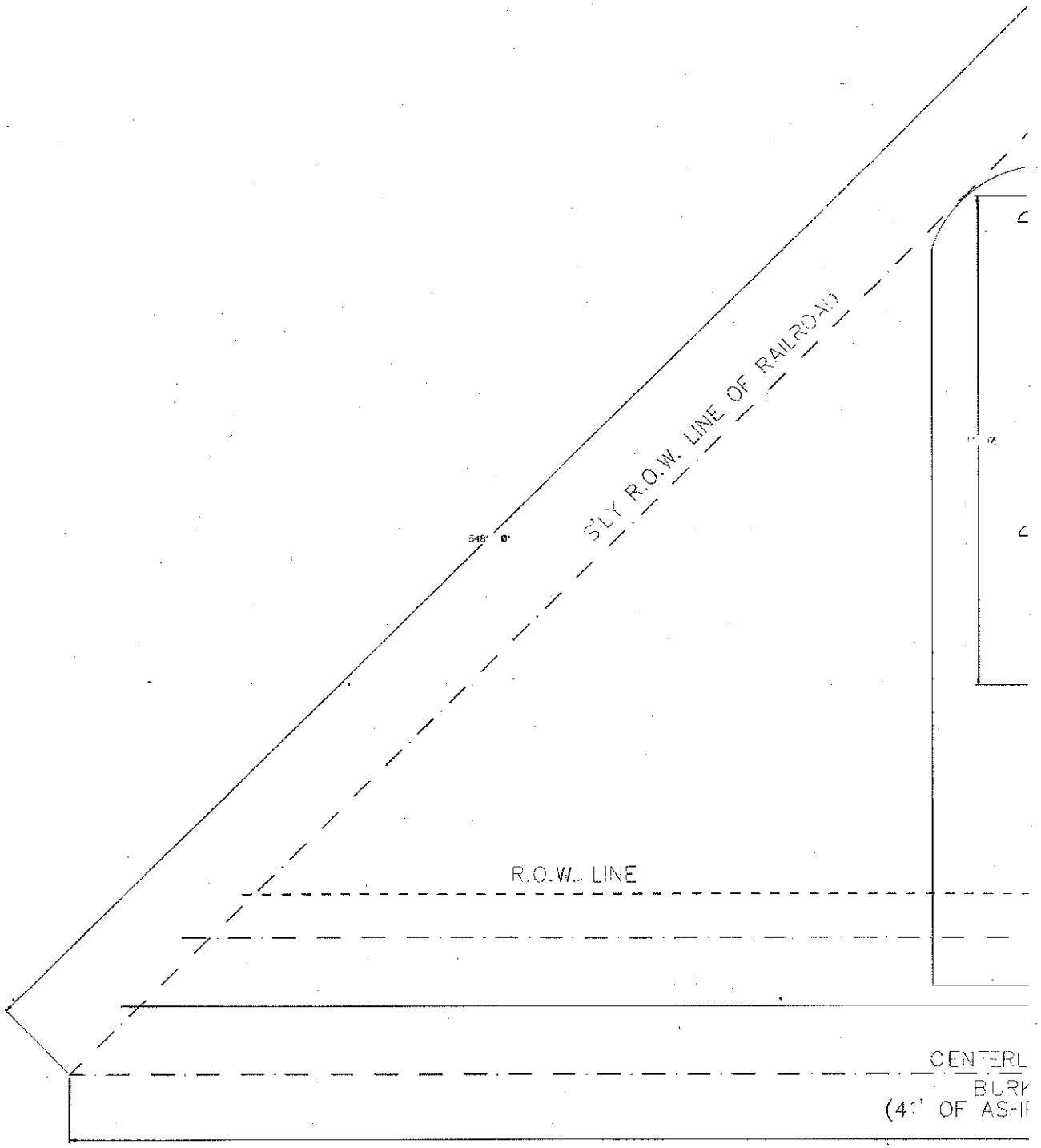


NORTH

PRECISE

SITE PLAN VIEW

1850 BURKHART RD.
HOWELL, MI. 48843


S'LY R.O.W. LINE OF RAILROAD
548° 0'
R.O.W. LINE
CENTERL
BURK
(4' OF AS-I

ATTACHMENT C: EP Waste Profile

04122011 DET

EQ - The Environmental Quality Company
Waste Characterization Report

TK# 379843

☑ *I authorize EQ - The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.*

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 North I-94 Service Drive, Belleville, Michigan 48111 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #MID000724831
☐ **Wayne Disposal, Inc.** (Hazardous & PCB Waste Landfill)	49350 North I-94 Service Drive, Belleville, Michigan 48111 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #MID048090633
☐ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick, Detroit, MI 48211 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #MID980991566
☐ **EQ Ohio (Envirite of Ohio)** (Stabilization and Treatment)	2050 Central Avenue, SE, Canton, OH 44707 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #OHD980568992
☐ **EQ Pennsylvania (Envirite of Pennsylvania)** (Stabilization and Treatment)	730 Vogelsong Road, York, PA 17404 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #PAD010154045
☐ **EQ Oklahoma, Inc.** (Stabilization, Wastewater Treatment)	2700 South 25th West Avenue, Tulsa, OK 74107-3435 Phone: 918-582-9595 Fax: 918-560-5252	EPA ID #OKD000402396
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, Michigan 48174 Phone: 734-727-5500 Fax: 734-326-4033	EPA ID #MID060975844
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East Eighth Ave., Tampa, FL 33619 Phone: 1-800-624-5302 Fax: 1-813-628-0842	EPA ID #FLD981932494
☐ **EQ Detroit Transfer and Processing** (Drum Transfer/Universal Waste Handling)	2000 Ferry Street, Detroit, MI 48211 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #MIK939928313
☐ **EQIS Indianapolis Transfer and Processing** (Drum Transfer/Non-Hazardous Waste Processing)	2650 N. Shadeland Avenue, Indianapolis, IN 46219 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #INR000125641
☐ **EQIS Atlanta Transfer and Processing** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd., Atlanta, Georgia 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID #GAR000039776
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd., Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID #GAR000011817

Please note, this profile should not be used for wastes destined to EQ Illinois (Envirite of Illinois). For more information, please contact our National Service Center at (800)592-5489.

Waste Common Name: ELECTROPOLISH

Section 1 - Generator & Customer Info

SIC/NAICS*:

Generator EPA ID: MID-985-612-597

Generator: PRECISE FINISHING
Address: 1650 N. BURKHARDT ROAD
City: HOWELL
State: MI Zip: 48843
County: LIVINGSTON

Mailing Address
Address: 1650 N. BURKHART ROAD
City: HOWELL
State: MI Zip: 48855

Generator Contact
Name: MARK SCHEMBRI
Title:
Phone: (517) 552-9200
Fax: ( ) -

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

EQ Customer No.:

Invoicing Company
Company:
Address:
City:
State: Zip:
Country:

Invoicing Contact
Name:
Phone: ( ) -
Fax: ( ) -

Technical Contact
Name:
Phone: ( ) -
Fax: ( ) -
Mobile: ( ) - Pager: ( ) -
E-mail:

Section 2 - Shipping & Packaging Info

2.1) Shipping Volume & Unit: 3000 GALLONS Frequency: Year

2.2) DOT Shipping Name:

2.3) Is this waste surcharge exempt? ○ Yes ● No (If you answered "Yes" to question 2.3, select the Surcharge Exemption reason.)

2.4) Packaging (check all that apply)

- ☐ Bulk Solid (yd³ < 2000 lbs/yd³)
- ☐ Totes, Size
- ☐ Other (palletized, 5 gal. Pail, etc.)
- ☐ Bulk Solid (Ton > 2000 lbs./yd³)
- ☐ Cubic Yard Boxes/Bags
- ☑ Bulk Liquids (Gallon)
- ☐ Drums, Size

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 - Physical Characteristics

3.1) Color: LIGHT GREEN 3.2) Odor: MILD

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ○ Yes ● No

3.4) Physical State at 70 °F: ☐ Solid ☐ Dust/Powder ☑ Liquid ☐ Sludge

3.5) What is the pH of this waste? ☑ ≤ 2 ☐ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥ 12.5

3.6) What is the flash point of this waste? ○ <90 °F ○ 90-139 °F ○ 140-199 °F ○ ≥ 200 °F

3.7) Does this waste contain? (check all that apply)

- ☐ None
- ☑ Free Liquids
- ☐ Oily Residue
- ☐ Metal Fines
- ☐ Ammonia
- ☐ Water Reactive
- ☐ Biohazard
- ☐ Aluminum
- ☐ Biodegradable Sorbents
- ☐ Amines
- ☐ Radioactive Waste
- ☐ Explosives
- ☐ Pyrophoric Waste
- ☐ Isocyanates
- ☐ Shock Sensitive Waste
- ☐ Reactive Waste
- ☐ Dioxins
- ☐ Furans
- ☐ Asbestos - non-friable
- ☐ Asbestos - friable

Section 4 - Composition / Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

PHOSPHORIC ACID	from		to	10. %
SULFURIC ACID	from		to	10. %
~~WATER~~ Malonic Acid	from		to	77 ~~96.~~ 79%

(attach flow diagram if available).

4.2) Provide a detailed description of the process generating this waste.

SS Parts are dipped into two tanks The First tank contains 20% acid and the rest water. The second tank is 80% Acid and the rest water. They then rinse the parts with water in the last two dip tanks We are taking the rinse water from the last two tanks

Section 5 - Is This Hazardous Waste?

Please see Section 5 of the EQ Resource Guide for a list of waste codes.

As determined by 40 CFR, Part 261 and Michigan Act 451 Rules: Please list applicable waste code(s):

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ○ Yes ● No

Comments:

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ● Yes ○ No D007, D002

Comments:

5.3) Do any State Hazardous Waste Codes apply? ○ Yes ● No

Comments:

5.4) Is this waste intended for wastewater treatment? ● Yes* ○ No

If you answered "No" to questions 5.1, 5.2, and 5.3, please skip to Section 7.
**If you answered "Yes" to question 5.4, please complete the WCR Addendum.*

Section 6 - Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction Levels? ● Yes ○ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ○ Yes ● No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ○ Yes ● No

6.2) Is the waste an oxidizer (D001)? ○ Yes ● No

6.3) Does this waste contain reactive cyanide ≥ 250 ppm (D003)? ○ Yes ● No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ○ Yes ● No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either 'Below' or 'Above' **MUST** be checked for each constituent.

Based On: ○ Generator Knowledge ● Analysis* ○ MSDS*

***Please forward a copy. Analysis or MSDS are required for EQ Florida Non-hazardous wastes.**

Code	Regulatory Level TCLP (mg/l)			Concentration (if above)
D004	Arsenic	5	● Below ○ Above	
D005	Barium	100	● Below ○ Above	
D006	Cadmium	1	● Below ○ Above	
D007	Chromium	5	○ Below ● Above	
D008	Lead	5	● Below ○ Above	
D009	Mercury	0.2	● Below ○ Above	
D010	Selenium	1	● Below ○ Above	
D011	Silver	5	● Below ○ Above	
D012	Endrin	0.02	● Below ○ Above	
D013	Lindane	0.4	● Below ○ Above	
D014	Methoxychlor	10	● Below ○ Above	
D015	Toxaphene	0.5	● Below ○ Above	
D016	2,4-D	10	● Below ○ Above	
D017	2,4,5-TP (Silvex)	1	● Below ○ Above	
D018	Benzene	0.5	● Below ○ Above	
D019	Carbon Tetrachloride	0.5	● Below ○ Above	
D020	Chlordane	0.03	● Below ○ Above	
D021	Chlorobenzene	100	● Below ○ Above	
D022	Chloroform	6.0	● Below ○ Above	
D023	o-Cresol	200	● Below ○ Above	
D024	m-Cresol	200	● Below ○ Above	
D025	p-Cresol	200	● Below ○ Above	
D026	Cresols	200	● Below ○ Above	
D027	1,4-Dichlorobenzene	7.5	● Below ○ Above	
D028	1,2-Dicholoroethane	0.5	● Below ○ Above	
D029	1,1-Dichloroethylene	0.7	● Below ○ Above	
D030	2,4-Dinitrotoluene	0.13	● Below ○ Above	
D031	Heptachlor	0.008	● Below ○ Above	
D032	Hexachlorobenzene	0.13	● Below ○ Above	
D033	Hexachlorobutadiene	0.5	● Below ○ Above	
D034	Hexachloroethane	3.0	● Below ○ Above	
D035	Methyl Ethyl Ketone	200	● Below ○ Above	
D036	Nitrobenzene	2	● Below ○ Above	
D037	Pentachlorophenol	100	● Below ○ Above	
D038	Pyridine	5	● Below ○ Above	
D039	Tetrachloroethylene	0.7	● Below ○ Above	
D040	Trichloroethylene	0.5	● Below ○ Above	
D041	2,4,5-Trichlorophenol	400	● Below ○ Above	
D042	2,4,6-Trichlorophenol	2	● Below ○ Above	
D043	Vinyl Chloride	0.2	● Below ○ Above	

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ○ Yes ● No

If you answered 'Yes', please list the constituents in Section 11.

Section 7 - Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide.

Applicable waste code(s):

7.1) Is this a Michigan non-hazardous liquid industrial waste? ○ Yes ● No

Comments:

7.2) Is this a Universal waste? ○ Yes ● No

7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ○ Yes ● No

7.4) Is this waste a recoverable petroleum product? ○ Yes ● No

7.5) Is this waste used oil as defined by 40 CFR Part 279? ○ Yes ● No

If you answered "Yes" to questions 7.4 or 7.5 please complete the following questions.

Evaluation based on: ○ Generator Knowledge ● Analysis (Please attach for review)

Wastewater and Recoverable Petroleum Products

Constituent	Organics mg/l	Actual Concentration
Bis (2-ethylhexyl) phthalate	☑ <0.158	
Carbazole	☑ <0.233	
o-Cresol	☑ <0.561	
p-Cresol	☑ <0.205	
n-Decane	☑ <3.31	
Fluoranthene	☑ <0.393	
n-Octadecane	☑ <0.925	
2,4,6-Trichlorophenol	☑ <0.106	
Phosphorus	☑ <500.0	
Total Chlorinated Phenolics	☑ <0.5	
2-Chlorophenol		
2,4-Dichlorophenol		
2,4,6-Trichlorophenol		
4-Chloro-3-Methyl Phenol		
Pentachlorophenol		
Total Organic Carbon	N/A	
Total PCB's	☑ <0.00006 (ND)	
Acidity/Alkalinity	☑ > 5 & <11.5	
FOG (Fats, Oils & Greases)	☑ <2,000.0	
TSS (Total Suspended Solids)	☑ <10,000.0	
BOD (Biological Oxygen Demand)	☑ <10,000.0	

Constituent	Metals mg/l	Actual Concentration
Total Antimony	☑ <0.141	
Total Arsenic	☑ <0.104	
Total Cadmium	☑ <0.0962	
Total Chromium	☑ <0.487	
Total Cobalt	☑ <0.124	
Total Copper	☑ <0.301	
Total Cyanide	☑ <2.0	
Total Iron	☑ <1,000.0	
Total Lead	☑ <0.172	
Total Mercury	☑ <0.000739	
Total Nickel	☑ <1.45	
Total Silver	☑ <0.0351	
Total Tin	☑ <0.12	
Total Titanium	☑ <0.0618	
Total Vanadium	☑ <0.0662	
Total Zinc	☑ <0.641	

Priority Pollutants	Attached Analysis	Non-Detect
Volatiles (8240)	○	●
Semi-Volatiles (8270)	○	●
Pesticides (8080)	○	●
Herbicides (8150)	○	●

Used Oil

1) Used oil is regulated under 40 CFR 279 if it is (1) a used oil, (2) has been refined from crude oil, and (3) as a result of use is contaminated by physical (e.g., solids) or chemical impurities (e.g., metals). Is this waste a used oil? ○ Yes ○ No

2) Has the waste oil been mixed with listed and/or characteristic hazardous waste? ○ Yes* ○ No
*If yes, what is the hazardous waste code(s) with which it has been mixed?

*If yes, the waste is regulated as a hazardous waste rather than a used oil (40 CFR 279.10(b)(1)).

3) Is the total halogen content of the used oil waste stream greater than 1,000 ppm? ○ Yes* ○ No
*If yes, what is the source of the halogen content?

○ This is a metalworking oil/fluid containing chlorinated paraffins.

○ This is a used oil contaminated with chlorofluorocarbons from refrigeration units.

○ This oil contains halogenated solvents. List specific solvents:

○ Other, describe:

Section 8 - TSCA Information

8.1) What is the concentration of PCBs in the waste? ● None ○ 0-5 ppm ○ 6-49 ppm ○ 50-499 ppm ○ 500+ ppm

8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ○ Yes ● No

If you answered 'None' to 8.1 and 'No' to 8.2, please skip to Section 9.

8.3) Has this waste been processed into a non-liquid form? ○ Yes ○ No

If yes, what was the concentration of PCBs prior to processing? (ppm) ○ N/A ○ 0-499 ○ 500+

8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ○ Yes ○ No

8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ○ Yes ○ No

8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ○ N/A ○ Yes ○ No

Section 9 - Clean Air Act Information

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ○ Yes ● No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants - VOHAP's or Volatile Organic Compounds - VOC's?)
For a complete list of VOHAPs, please see Section 11 of the EQ Resource Guide.

9.2) Is this site, or waste, subject to any other MACT or NESHAP? ○ Yes ● No

If yes, please specify:

9.3) Does this waste stream contain Benzene? ○ Yes ● No

If you answered "No" to question 9.2, please skip to section 10.

9.4) Does the waste stream come from a facility with one of the SIC/NAICS codes listed under the Benzene NESHAP identified in 40 CFR 61, Subpart FF? ○ Yes ○ No

9.5) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥ 10 Mg/year? ○ Yes ○ No

For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.

If you answered "No" to question 9.3 and 9.4, please skip to Section 10.

9.6) Does the waste contain > 10% water? ○ Yes ○ No

9.7) What is the TAB quantity for your facility? Mg/year

9.8) Does the waste contain >1.0 mg/kg total Benzene? ○ Yes ○ No

9.9) What is the total Benzene concentration in your waste? (concentration) (unit)

(Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)

*For a list of NAICS codes, please refer to section 9 of the EQ Resource Guide.

Section 10 - Fuel Blending Information

10.1) Is this waste intended for fuel blending? ○ Yes* ● No

If you answered 'Yes' to question 10.1, please enter the following:

Heat value (BTU/lb.) _ _ _ _ _

Chlorine (%) _ _ _ _ _

Water (%) _ _ _ _ _

Solids (%) _ _ _ _ _

10.2) Is this waste intended for reclamation? ○ Yes ● No (5-Gallon Sample required for all reclaim waste streams)

Section 11 - Constituent Information

Please identify your waste constituents from these four categories: **Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)**

Constituent	Concentration	UHC?

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Comments:

Generator: Mark Schemba Mark Schemba Precise Finishing Systems
Authorized Generator Signature *Printed Generator Name*

Company: Precise Finishing Systems Title: Manager Fabrication/Process Date: 4/12/11

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

STANDARD TERMS AND CONDITIONS

This Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Characterization Report, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Definitions.

The following definitions shall apply for purposes of this Agreement:

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii)) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Characterization Report and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Characterization Report (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Characterization Report containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Characterization Report, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Characterization Report.

Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Characterization Report. The information set forth in the Waste Characterization Report or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Characterization Report, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

Governing Laws.

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state

ATTACHMENT D: Inspection Checklist

BK

Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name Precise Finishing Systems Part 3 Rules

Date 2/27/2014 ID# MID985612597 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11

(NI = Not inspected; N/A = Not applicable)

		YES / NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	[✓] ___ NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	[✓] ___ NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[✓] ___ NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	[ ] ___ NI (N/A)
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)		
3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12) Also currently used by T2	262A	[✓] ___ NI N/A
MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)		
4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	[✓] ___ NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	[✓] ___ NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:		
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[✓] ___ NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[✓] ___ NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[✓] ___ NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[✓] ___ NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[✓] ___ NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)), 1/24/14 manifest	262B	[✓] ___ NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)), incorrectly had D006 code	262B	[✓] ___ NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[✓] ___ NI N/A
7. NOT APPLICABLE		
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	[ ] ___ NI (N/A)
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	[✓] ___ NI N/A

NOTE: *For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).*

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	___ [✓] NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).		
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:		
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:		
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	[✓] ___ NI N/A

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	[✓] ___ NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
a) all listed waste	268A	[✓]	NI N/A
b) all characteristic wastes?	268A	[✓]	NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	[✓]	NI N/A
OR			
16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	[ ]	NI N/A
OR			
17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	[ ]	NI N/A
OR			
18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	[ ]	NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)			
a) EPA hazardous waste #?	268A	[ ]	NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	[ ]	NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	[ ]	NI N/A
d) manifest number associated with the shipment?	268A	[ ]	NI N/A
e) waste analysis data, where available?	268A	[ ]	NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	[ ]	NI N/A
UNLESS			
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	[ ]	NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	[ ]	NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)			
a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	[ ]	NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	[ ]	NI N/A

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	268A	[✓]	NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	[ ]	NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	268A	[✓]	NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	[✓]	NI N/A

TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	[ ]	NI N/A

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	[✓]	NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	[✓]	NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)		YES NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said ✓ obsrvd __ [✓] __ NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said ✓ obsrvd __ [✓] __ NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said ✓ obsrvd __ [✓] __ NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[✓] __ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)		
32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2)) T2 waste had	262C	[✓] __ NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3)) inaccurate dates	262C	[✓] __ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b)) Precise + T2 waste	262C	[ ] ✓ NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1) had no codes	262C	__ [✓] NI N/A

OR

e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] __ NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	[ ] __ NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	[ ] __ NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	[ ] __ NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	[✓] __ NI N/A
g) are containers compatible with waste in them (265.172)	262C	[✓] __ NI N/A
h) are containers stored closed? (265.173(a))	262C	[✓] __ NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	__ [✓] NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	[✓] __ NI N/A
k) are containers inspected weekly for leaks and defects? (265.174) Inspection records claimed waste	262C	[✓] __ NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i)) containers were marked w/	262C	[✓] __ NI N/A
m) Inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i)) waste codes, see above	262C	[✓] __ NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	[ ] __ NI (N/A)
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	__ [ ] NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ] __ NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[✓] __ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[ ] __ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[ ] __ NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[ ] __ NI N/A
e) are container(s) in good condition? (265.171)	262C	[ ] __ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[ ] __ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[ ] __ NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	[ ] __ NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[ ] __ NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
a) impervious base free of cracks? (264.175(b)(1)) :	262C	[ ] __ NI (N/A)

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	[ ]	NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	[ ]	NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	[ ]	NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	[ ]	NI N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	[ ] ✓	NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e. process tank? *Explain any yes answer.* are closest to process tanks, or		✓	NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e)) "mfg process unit," that are	262C	[✓]	NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f)) See 265.31 below drained at a later date	262C	[✓]	NI N/A
40. Is hazardous waste accumulated in tanks? *If so, complete Tank System inspection form.*		✓	NI N/A
41. Is hazardous waste placed on drip pads? *If so, complete Wood Preserving inspection form*		✓	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16

PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	262C	[✓]	NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))	262C	[✓]	NI N/A
b) job descriptions? (265.16(d)(2))	262C	[ ]	NI N/A
c) name of employee filling each job? (265.16(d)(1))	262C	[ ]	NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	[ ]	NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)	262C	[ ]	NI N/A
f) records of training? (265.16(d)(4))	262C	[ ]	NI N/A
g) do new personnel receive required training within 6 months? (265.16(b)	262C	[ ]	NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	[ ]	NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	[ ]	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.

PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31) Chemical buildup at EP tanks,	262C	co.said [ ] observd ✓	NI N/A
45. If required, does this facility have the following: free liquid in secondary containment,			
a) internal communications or alarm systems? (265.32(a)) hole in secondary containment	262C	[✓]	NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	[✓]	NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	[✓]	NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	[✓]	NI N/A
46. Testing and Maintenance of Emergency Equipment			
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	[✓]	NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable **only** if required (40 CFR 265. 32)			
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	[ ]	NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	[ ]	NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35) T2 had obstructed	262C	[✓]	NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b)) aisle space	262C	[✓]	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	[ ]	NI N/A
49. Does the contingency plan contain the following:			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	[✓]	NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	[✓]	NI N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	[✓] NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[ ] [✓] NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	[ ] [✓] NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	[ ] NI N/A
Emergency Coordinator and Emergency Procedures:		
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	[✓] NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	[✓] NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[ ] NI (N/A)
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	[ ] NI N/A
51. Contingency plan Amendments and Copies		
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	[✓] NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	[✓] NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		NI (N/A)
a) exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	[ ] NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	[ ] NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	[ ] NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ] NI N/A
v) if required, was an exception report filed. (309(3)(a-c))	262E	[ ] NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:		
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[ ] NI (N/A)
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	[ ] NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	[ ] NI N/A

COMMENTS: